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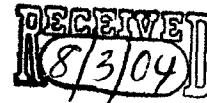
9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 • F: 503.582.0467

ENZYMATIC THERAPY™
&
PHYTOPHARMICA™

825 Challenger Drive, Green Bay, WI 54311-8328
P: 920.469.1313 • F: 888.570.6460 (Enzymatic)
P: 920.469.9099 • F: 920.469.4418 (Phyto)

July 25, 2004

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740



RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	A daily supplement provides support for daily energy and essential nutrition.*	Vitamin A (50% beta carotene and 50% retinyl acetate), Vitamin B1 (Thiamin HCl), Vitamin B2 (Riboflavin), Vitamin B6 (Pyridoxine HCl), Vitamin B12, (Cyanocobalamin), Vitamin C (ascorbic acid), Vitamin D3 (as cholecalciferol), Vitamin E (as d-a-tocopheryl acetate), Niacinamide, Biotin, Folic Acid, Pantothenate (calcium d-pantothenate), Calcium (as calcium lactate), Iodine (as potassium iodide), Magnesium (as magnesium glycinate), Zinc (as zinc sulfate), Selenium (as L- selenomethionine), Copper (as copper gluconate), Manganese (as manganese citrate), Chromium (as chromium picolinate), Molybdenum (as sodium molybdate), Boron (sodium boron), Potassium (from whey protein, guar gum, potassium citrate and potassium iodide), Whey Protein, Malic Acid, Inositol, Inulin (from chicory root), Lutein

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Mega MultiVitamin Drink Mix also contains inulin as a source of fiber and to boost absorption of minerals.*	Inulin (from chicory root)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

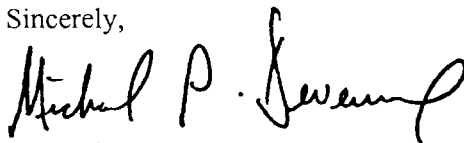
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/25/04

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs, at (920) 406-3608.

Sincerely,



Michael P. Devereux
Chief Financial Officer



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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	A homocysteine lowering agent that also supports healthy circulation.*	Vitamin B6 (as pyridoxine HCl)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

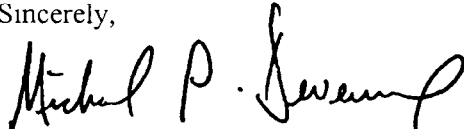
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

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July 26, 2004

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Food and Drug Administration
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Assists in production of circulating antibodies.*	Vitamin B6 (as pyridoxine HCl)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: _____

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: _____

7/26/04

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs, at (920) 406-3608.

Sincerely,


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Chief Financial Officer



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July 27, 2004

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Essential for the normal production of red and white blood cells.*	Folic Acid

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

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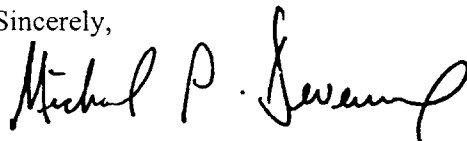
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/27/04

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Michael P. Devereux
Chief Financial Officer



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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Lowers homocysteine levels.*	Folic Acid

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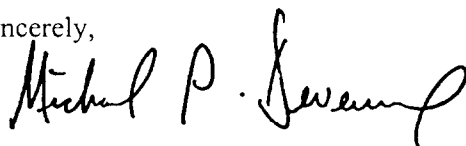
By: 
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/27/04

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Coenzyme necessary in the production of normal red blood cell formation, generation of the amino acid methionine, entrance of some amino acids into the Krebs cycle, and the manufacturing of choline (used to for acetocholine production).*	Vitamin B12 (Cobalamin)

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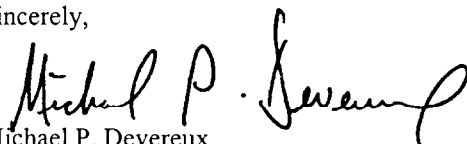
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Robert C. Doster

Title. Senior Vice President of Scientific Affairs

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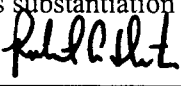
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Lowers homocysteine levels.*	Vitamin B12 (Cobalamin)

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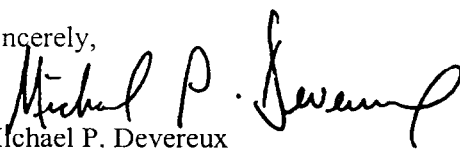
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Title: Senior Vice President of Scientific Affairs

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Essential coenzyme required by the mitochondria for cellular production of energy.*	Biotin

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By: _____

Robert C. Doster

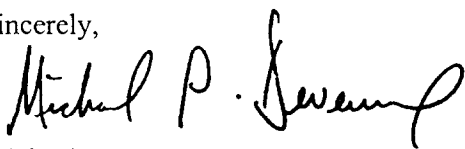
Title: Senior Vice President of Scientific Affairs

Date: _____

7/27/04

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Mega MultiVitamin Drink Mix	Required for the conversion of pyruvic acid to oxaloacetic acid and the synthesis of fatty acids and purines.*	Biotin

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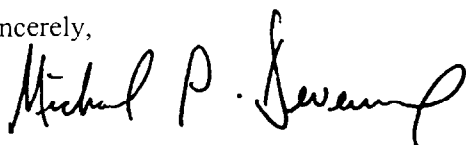
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Mega MultiVitamin Drink Mix	Supports healthy hair and skin.*	Biotin

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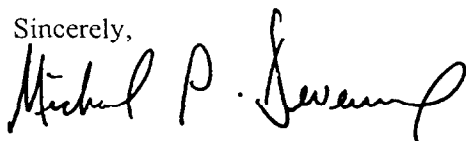
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RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Essential for transfer of pyruvic acid into the Krebs cycle, conversion of lipids and amino acids into glucose, synthesis of cholesterol and steroid hormones.*	Pantothenic Acid

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: _____

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: _____

7/28/04

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs, at (920) 406-3608.

Sincerely,

Michael P. Devereux
Chief Financial Officer



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INCORPORATED

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P: 920.469.9099 • F: 920.469.4418 (Phyto)

July 28, 2004

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Necessary for bone health.*	Calcium(as calcium lactate)

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Allows proper interaction of myosin and actin proteins to support proper muscle contraction.*	Calcium(as calcium lactate)

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Required by thyroid gland to synthesize thyroid hormones, which regulate the basal metabolic rate.*	Iodine (as potassium iodide)

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Supports healthy metabolic rate; supports growth regulation.*	Iodine (as potassium iodide)

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Magnesium regulates nerve muscle firing.*	Magnesium (as magnesium glycinate)

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Robert C. Doster

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Required for normal functioning of muscle and nervous tissue.*	Magnesium (as magnesium glycinate)

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By: 

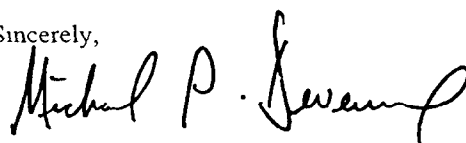
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Participants in bone formation.*	Magnesium (as magnesium glycinate)

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By: 

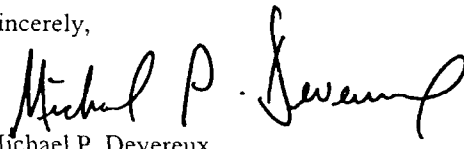
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Constituent of many coenzymes.*	Magnesium (as magnesium glycinate)

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By: 

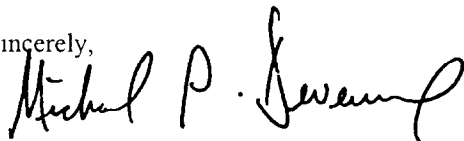
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Supports a healthy immune system and enzymes involved in energy production.*	Magnesium (as magnesium glycinate)

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By: 

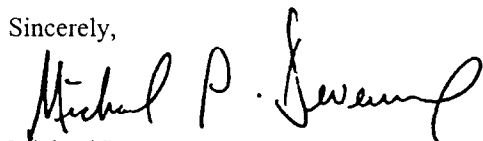
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	As a component of carbonic anhydrase, important in carbon dioxide metabolism.*	Zinc (as zinc sulfate)

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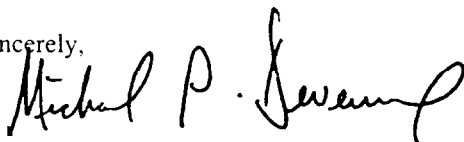
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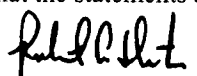
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	As a component of peptidases, it is involved in protein digestion.*	Zinc (as zinc sulfate)

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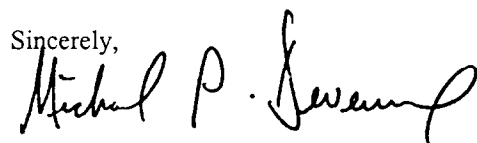
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Mega MultiVitamin Drink Mix	Zinc has been shown in clinical trials to support healthy aortic valves and overall cardiovascular health.*	Zinc (as zinc sulfate)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

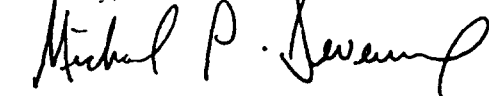
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/29/04

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs, at (920) 406-3608.

Sincerely,



Michael P. Devereux
Chief Financial Officer



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P: 920.469.1313 ♦ F: 888.570.6460 (Enzymatic)
P: 920.469.9099 ♦ F: 920.469.4418 (Phyto)

July 29, 2004

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

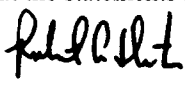
RE: Label Claims/Disclaimers

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Supports healthy immune system; supports healthy enzyme processes; supports healthy immune response.*	Zinc (as zinc sulfate)

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By: 

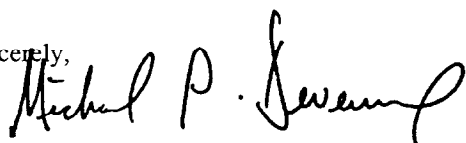
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	With vitamin E supports healthy cell membranes; supports healthy thyroid functioning.*	Selenium (as L-selenomethionine)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

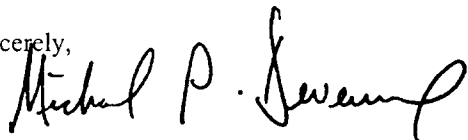
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Supports healthy energy metabolism; healthy skin integrity; supports healthy iron utilization.*	Copper (as copper gluconate)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: _____

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: _____

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Supports healthy metabolic reactions.*	Manganese (as manganese citrate)

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By: _____

Robert C. Doster

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Date: _____

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Activates several enzymes and has antioxidant properties.*	Manganese (as manganese citrate)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: _____

Robert C. Doster

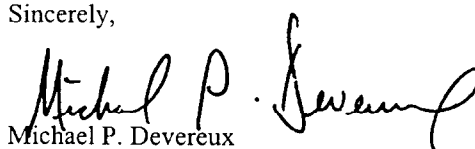
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Date: _____

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Needed for hemoglobin synthesis, urea formation, growth, reproduction, lactation, bone formation, possibly the production and release of insulin and inhibiting cell damage.*	Manganese (as manganese citrate)

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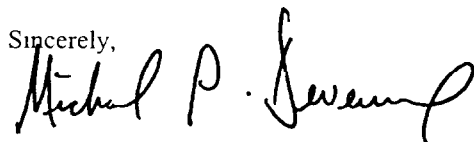
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Helps support the retention of healthy cholesterol levels that are already in normal limits.*	Chromium (as chromium picolinate)

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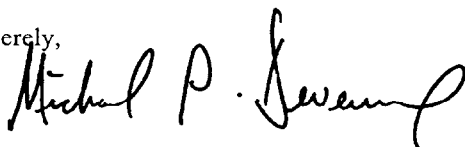
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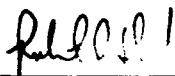
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Supports healthy iron metabolism; supports healthy uric acid production; supports healthy sexual functioning in men.*	Molybdenum (as sodium molybdate)

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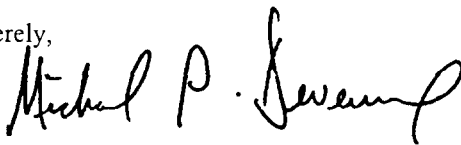
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Functions as a cofactor for three enzymes which contribute to the antioxidant capacity of the blood and also play a role in the metabolism of drugs.*	Molybdenum (as sodium molybdate)

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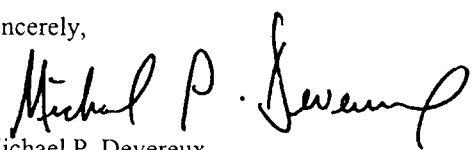
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Supports healthy nervous system; supports regular heart rhythm; supports proper muscle contraction, especially healthy cardiac muscle contraction.*	Potassium (from whey protein, guar gum; as potassium citrate and potassium iodide)

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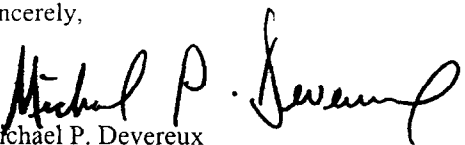
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Supports healthy muscle and tissue formation; supports healthy immune system functioning.*	Whey protein

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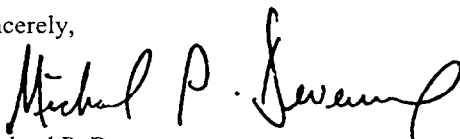
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Title: Senior Vice President of Scientific Affairs

Date: 7/31/04

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs, at (920) 406-3608.

Sincerely,



Michael P. Devereux
Chief Financial Officer

**INTEGRATIVE THERAPEUTICS INC.***NF Formulas • PhytoPharmica
Tyler Encapsulations • Vitaline Formulas9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 • F: 503.582.0467**ENZYMATIC THERAPY*****&
PHYTOPHARMICA***825 Challenger Drive, Green Bay, WI 54311-8328
P: 920.469.1313 • F: 888.570.6460 (Enzymatic)
P: 920.469.9099 • F: 920.469.4418 (Phyto)**ENZYMATIC THERAPY**
INCORPORATED*What **Better** feels like™*

July 31, 2004

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Catalyst to stimulate the complete burning of fuel for energy; supports healthy connective tissue and muscle functioning.*	Malic Acid

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

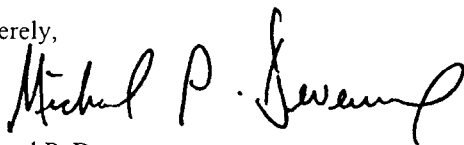
Robert C. Doster

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Works with B vitamins to synthesize amino acids, precursor to SAM-e.*	Betaine

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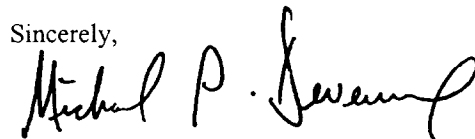
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Robert C. Doster
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Supports healthy nerve cell transmission.*	Inositol

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: _____

Robert C. Doster

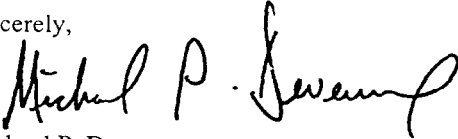
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Supports healthy mineral absorption; supports healthy immune system response; helps with lipid and glucose metabolism.*	Inulin (from chicory root)

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: _____

Robert C. Doster

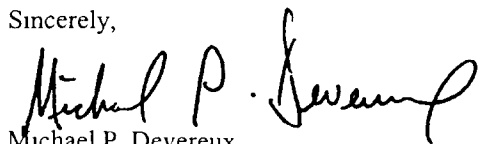
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Date: _____

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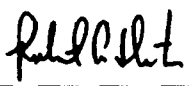
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	A flavonoid, hesperidin displays antioxidant activity, prevents free radical damage; supports healthy lipid metabolism; supports healthy vascular functioning; supports healthy immunity.*	Hesperidin 50% (from citrus fruits)

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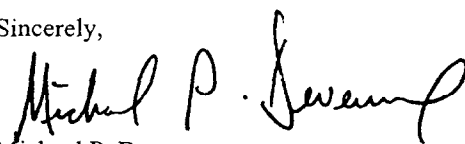
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Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/31/04

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	A nonprotein amino acid; helps stabilize the excitability of nervous system membranes; assists in healthy aging mechanisms; aids in the clearing of free radical wastes.*	L-Taurine

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

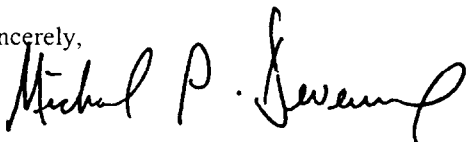
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 7/31/04

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Chief Financial Officer



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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	A protein amino acid; helps trigger the release of oxygen to the energy requiring cell-making process; supports the manufacturing of hormones responsible for a healthy immune system.*	L-Glycine

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: _____

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: _____

7/31/04

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Chief Financial Officer



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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	An amino acid, supports healthy nerve transmission; supports healthy functioning of the thyroid, adrenal, and pituitary glands.*	L-Tyrosine

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: _____

Robert C. Doster

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Date: _____

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	An amino acid, helps strengthen the immune system; supports synthesis of fatty acid sheath around nerve fibers.*	L-Serine

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By: 

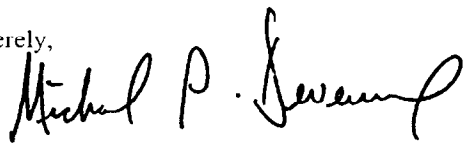
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Supports the maintenance of healthy blood sugar levels already within normal range.*	Stevia (Stevia rebaudiana) Leaf Extract

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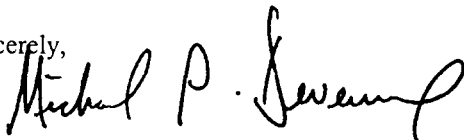
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Rich in antioxidants and support the immune system.*	Sour Cherry (Prunus cerasus) Fruit Extract

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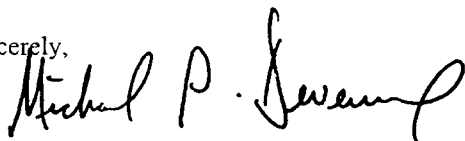
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Title: Senior Vice President of Scientific Affairs

Date: 8/1/04

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RE: Label Claims/Disclaimers

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This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Supports urinary tract function*	Cranberry (Vaccinium macrocarpon) Fruit Extract

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

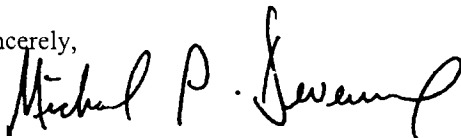
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/1/04

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs, at (920) 406-3608.

Sincerely,



Michael P. Devereux
Chief Financial Officer



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P: 920.469.9099 ♦ F: 920.469.4418 (Phyto)

August 1, 2004

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Rich in flavonoids and supports eye health.*	Bilberry (Vaccinium myrtillus) Fruit Extract

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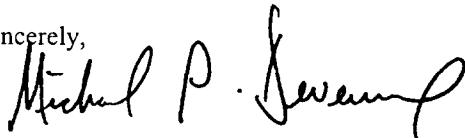
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Supports healthy bone and joint function; supports healthy muscle health; supports healthy muscle synthesis.*	Boron (as sodium borate)

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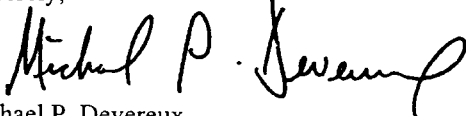
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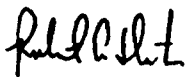
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	A potent antioxidant. Supports eye health.*	Zeaxanthin (from Calendula officinalis)

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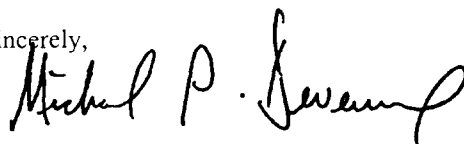
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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	The building blocks of protein, amino acids are nitrogen-containing organic compounds composing the structure of proteins. They are essential to human metabolism and to making the human body function properly for good health.*	L-Alanine, L-Arginine, L-Aspartic Acid, L-Cystine, L-Glutamic Acid, L-Glycine, L-Histidine, L-Isoleucine, L-Leucine, L-Lysine, L-Methionine, L-Phenylalanine, L-Proline, L-Serine, L-Taurine, L-Threonine, L-Tryptophan, L-Tyrosine, L-Valine

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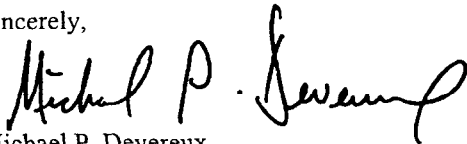
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 8/1/04

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Sincerely,

A handwritten signature in black ink, reading "Michael P. Devereux". The signature is fluid and cursive, with the first name "Michael" and last name "Devereux" clearly legible, and "P." in the middle.

Michael P. Devereux
Chief Financial Officer



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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Mega MultiVitamin Drink Mix	Amino acids are key to every human bodily function with every chemical reaction that occurs.*	L-Alanine, L-Arginine, L-Aspartic Acid, L-Cystine, L-Glutamic Acid, L-Glycine, L-Histidine, L-Isoleucine, L-Leucine, L-Lysine, L-Methionine, L-Phenylalanine, L-Proline, L-Serine, L-Taurine, L-Threonine, L-Tryptophan, L-Tyrosine, L-Valine

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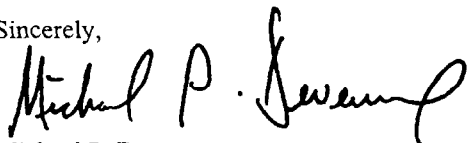
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Michael P. Devereux
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